

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Plaintiff,

**NOTICE OF MOTION**

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.

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**PLEASE TAKE NOTICE** that, upon the reading and filing of Plaintiff's Memorandum of Law in Support of its Motion for Sanctions, Plaintiff, IME Watchdog, Inc., by and through the undersigned counsel, will move this Court before the Honorable Pamela K. Chen, U.S.D.J. as soon as counsel may be heard, for an Order:

(i) Pursuant to Rule 37 of the Fed. R. Civ. Proc, for violating this Court's July 29, 2024 Order:

(a) directing Defendants to submit complete financial records to the Court, including bank statements and documentation of all rental agreements, real property, investments, and other assets;

(b) directing Defendants to submit a sworn declaration stating that no other bank accounts exist or have existed for any of the Defendants and any of their businesses in the last two (2) years other than those identified in the documents produced by Defendants in ECF Docket Entry 379;

(c) directing Defendants to pay civil penalties and Plaintiff's attorneys' fees; and

(d) such other and further relief as this Court deems just and proper.

(ii) Pursuant to Rules 11(b) and (c) of the Fed. R. Civ. Proc., 28 U.S.C. § 1927, and this Court's inherent power, for making numerous misrepresentations that Defendants were selling their Staten Island home and were awaiting a closing date and that the buyer backed out of the deal:

(a) forcing the sale of Defendants' Staten Island home located at 148 Claypit Rd, Staten Island NY 10309;

(b) the payment of monetary sanctions by Defendants and their counsel;

(c) the payment by Defendants and their counsel of Plaintiff's attorneys' fees incurred for filing this motion; and

(d) requiring Defendants to place all rental income received since March 1, 2024 in escrow together with all future rental income received until the sale of the home; and

(e) such other and further relief as this Court deems just, equitable, and proper.

Dated: August 28, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

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